

Steve W. Berman (*pro hac vice*)
 Mark S. Carlson (*pro hac vice*)
 Jerrod C. Patterson (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1301 Second Avenue, Suite 2000
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com
 markc@hbsslaw.com
 jerrodp@hbsslaw.com

Rio S. Pierce, CBA No. 298297
 HAGENS BERMAN SOBOL SHAPIRO LLP
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 riop@hbsslaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

REARDEN LLC, REARDEN MOVA LLC,

Plaintiffs,

v.

DISNEY ENTERPRISES, INC., a Delaware corporation, DISNEY STUDIO PRODUCTION SERVICES CO., LLC f/k/a WALT DISNEY PICTURES PRODUCTION, LLC, a California limited liability company, WALT DISNEY PICTURES, a California corporation, MARVEL STUDIOS, LLC a Delaware limited liability company, MVL PRODUCTIONS LLC, a Delaware limited liability company, CHIP PICTURES, INC., a California corporation, INFINITY PRODUCTIONS LLC, a Delaware limited liability company, ASSEMBLED PRODUCTIONS II LLC, a Delaware limited liability company,

Defendants.

Case No. 4:17-cv-04006-JST

PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER DEFENDANTS' MATERIAL SHOULD BE SEALED REGARDING PLAINTIFFS' OPPOSITIONS TO MOTION FOR SUMMARY JUDGMENT AND DAUBERT MOTIONS

Courtroom: 6 – 2nd Floor
 Judge: Honorable Jon S. Tigar

PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER DEFENDANTS' MATERIAL SHOULD BE SEALED

Pursuant to Civil L.R. 79-5(d) and (e), Plaintiffs Rearden LLC and Rearden Mova LLC ("Rearden") (collectively, "Plaintiffs") hereby file this Administrative Motion to Consider Whether Defendants' Material Should be Sealed regarding Plaintiffs' Oppositions to Motion for Summary Judgment and *Daubert* Motions (the "Motion").

The documents that are listed below are designated confidential (including Attorneys' Eyes Only) by Defendants subject to the Protective Order in the above-captioned case. Rearden takes no position on the propriety of the confidentiality designations for purposes of this motion, but rather leaves it to Defendants to defend their designations in their response.

Rearden's counsel have reviewed and complied with this Court's Standing Order Governing Administrative Motions to File Materials Under Seal and Civil L.R. 79-5(d) and (e). Rearden's request is narrowly tailored and requests sealing only portions of the record that correspond to materials that defendants have described as sealable material. Civil L.R. 79-5(b).

Document	Basis for Redaction / Filing Under Seal
Opposition to Motion for Summary Judgment	
Exhibit 1 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit 2 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
Exhibit 3 to the Declaration of Mark Carlson	Defendants designated documents referenced in this brief as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit 4 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
Exhibit 5 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.

1	Exhibit 6 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
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3	Exhibit 7 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
4		
5	Exhibit 15 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
6		
7	Exhibit 20 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
8		
9	Exhibit 22 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
10		
11	Exhibit 23 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
12		
13	Exhibit 24 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
14		
15	Exhibit 25 to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
16		
17	Exhibit 26 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
18		
19	Exhibit 27 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
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21	Exhibit 28 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
22		
23	Exhibit 29 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
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25	Exhibit 30 to the Declaration of Mark Carlson	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
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Exhibit E to the Declaration of Stephen Perlman in Support of Opposition to Defendants' Motion for Summary Judgment	Defendants designated this document as Confidential under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Philip Fier	
Opposition to Motion to Exclude Philip Fier	Defendants designated documents referenced in this brief as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
Exhibit A to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit B to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit F to the Declaration of Jerrod Patterson	Defendants designated information referenced in this brief as Confidential under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Cindy Ievers	
Exhibit C to the Declaration of Jerrod Patterson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Opposition to Motion to Exclude Alberto Menache	
Opposition to Motion to Exclude Alberto Menache	Defendants designated documents referenced in this brief as Attorney's Eyes Only and Confidential under the stipulated protective order, Dkt. 114.
Exhibit A to the Declaration of Mark Carlson	Defendants designated this document as Attorney's Eyes Only under the stipulated protective order, Dkt. 114.
Exhibit C to the Declaration of Mark Carlson	Defendants designated information referenced in this brief as Confidential under the stipulated protective order, Dkt. 114.

DATED: August 3, 2023

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Jerrod Patterson
JERROD PATTERSON

1 Steve W. Berman (*pro hac vice*)
2 Mark Carlson (*pro hac vice*)
3 1301 Second Avenue, Suite 2000
4 Seattle, WA 98101
5 Telephone: (206) 623-7292
6 Facsimile: (206) 623-0594
7 steve@hbsslaw.com
8 markc@hbsslaw.com
9 jerrodp@hbsslaw.com

7 Rio S. Pierce, CBA No. 298297
8 HAGENS BERMAN SOBOL SHAPIRO LLP
9 715 Hearst Avenue, Suite 202
10 Berkeley, CA 94710
11 Telephone: (510) 725-3000
12 Facsimile: (510) 725-3001
13 riop@hbsslaw.com

12 *Attorneys for Plaintiffs*